

Federal Facilities Multi-Media Enforcement/Compliance Initiative

Final National Report

December 1995

Office of Enforcement and Compliance Assurance Federal Facilities Enforcement Office

Executive Summary

This is the Final National Report on the FY 1993-94 Federal Facilities Multi-Media Enforcement/Compliance Initiative (FMECI). An Interim National Report was published in November of 1994. The FMECI was designed to assess the compliance status of Federal facilities with environmental laws using a multi-media approach. EPA established the FMECI as a priority for FY 1993-1994, recognizing that Federal facilities are a highly visible sector of the regulated community and have historically demonstrated lower rates of compliance with environmental laws than their private sector counterparts. It also provided EPA an opportunity

FMECI FY 1993-1994 HIGHLIGHTS

- The 73 FMECI inspections in FY 1993-1994 represent a significant investment in the Federal facility sector by EPA and participating States.
- On average, Regions evaluated compliance with five environmental statutes/programs during each inspection. Thus, the 73 multi-media inspections conducted during the FMECI would be equivalent to 365 single-media inspections.
- Approximately 75 percent (55 of 73) of the inspected facilities received a total of 119 EPA or State enforcement actions for violations under nine separate environmental statutes.
- Of the facilities receiving enforcement actions, 60 percent (33 of 55) violated more than one statute.
- More than 45 percent (33 of 73) of all inspected facilities violated two or more statutes.
- EPA documented significant levels of State involvement in the FMECI. States led 23 percent of inspections and participated in an additional 59 percent of inspections.
- EPA's procedures and approach to conducting multi-media inspections can be effective, regardless of the size or operating agency of the facilities involved.
- EPA Regions proposed a total of more than \$3.7 million in penalties.
- EPA and States encouraged facilities to adopt pollution prevention strategies as first-choice measures to return to and maintain compliance.

to pilot multi-media compliance and enforcement approaches within one sector of the regulated community -- Federal facilities. Although the initiative has ended, multi-media inspection and enforcement activities at Federal Facilities have now been integrated into all EPA Regional enforcement programs.

BACKGROUND

The goals of the FMECI were to:

- Foster improved Federal agency compliance with and awareness of environmental

laws and regulations;

- Help reduce environmental risks posed by Federal facilities through a multi-media inspection and enforcement approach;
- Achieve a more efficient use of enforcement authorities and resources; and
- Expand the application of pollution prevention approaches to compliance problems so that facilities can exceed baseline compliance.

This Report examines five key areas of the FMECI:

- Compliance and enforcement results;
- Pollution Prevention efforts;
- Administration, protocol, and resources used in carrying out multi-media inspections;
- Regional/State coordination levels; and
- Overall impacts of the multi-media inspection approach.

The remainder of this executive summary presents the key findings of the FMECI Report. Additional details on the type, size, and location of facilities inspected; types of enforcement actions taken and size of penalties; pollution prevention conditions and supplemental environmental projects undertaken as part of enforcement action; and the level of Federal/State interaction during the FMECI are contained in the national summary. The Report also contains detailed Regional descriptions of the program.